<center>REMARKS</center>

This application has been reviewed in light of the Office Action dated December 28, 2006. Claims 1-26 are presented for examination, of which Claims 1 and 12 are in independent form. Claims 1-5 and 7-25 have been amended purely as to formal matters, which do not affect their scope and have not been made to overcome any of the claim rejections discussed below. Favorable reconsideration is respectfully requested.

The Office Action states that paragraph [0017] of the specification is objected to because it contains an embedded hyperlink and/or other form of browser-executable code. The URL and IP addresses in the specification are used in paragraph 17 merely to provide an example of a URL and an IP address. Although Applicants do not believe that the objection to the specification is warranted, Applicants have nevertheless amended the specification as required in the Office Action. Specifically, paragraph [[0017]] of the specification has been amended to delete -- (http://yahoo.com/stockquotes/ge)-- and --(123.56.789)--. Therefore Applicants believe the objection to the specification has been obviated.

The Office Action states that Claims 1-26 are rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent Application Publication No. 2002/0049853 (Chu). Applicants respectfully traverse the rejections and submit that independent Claims 1 and 12, together with the claims dependent there from, are patentably distinct from the cited prior art for at least the following reasons.

The aspect of the present invention set forth in Claim 1 is directed to a system to facilitate movement of electronic files. The system includes a file transfer

services component configured to at least one of transmit and receive a file request, and

also is configured to communicate with a centralized file management hub. The system

also includes a file transformation component configured to at least one of reformat,

validate, and enrich file content using enterprise logic. Further, the system includes a

centralized file management hub configured to communicate with a messaging

infrastructure. The system also includes a messaging infrastructure component

configured to facilitate workflow management of the files through the system.

One of the notable features of Claim 1 is that the file transformation

component is configured to at least one of reformat, validate, and enrich file content

using enterprise logic. As discussed in the specification in portions of paragraphs [0023]

to [0025],

> ...Enterprise logic may include the business rules that are
> applied to the data content. For example, specific field
> content within a file may specify a value and the business
> may have rules in place about what field values are
> considered acceptable.
>
> ...Validating data may include, for example, ensuring that
> the data includes syntactical integrity as received from the
> client...
>
> ...Validation rules may include, for example, business rules
> that are applied to specific fields within a file to determine
> whether the content of the file is valid....

Claim 1, as reasonably interpreted in light of the plain meaning of the claim terms

consistent with the specification, clearly relates to something different from the system

described in Chu.

Chu is understood to relate to a system of uploading and downloading

electronic documents through a server. Particularly, Chu does not disclose a component

that is configured to at least validate file content using enterprise logic. In the following

portion of paragraph 106, Chu discloses:

> ...Data received at the client is read from a socket. If the
> socket indicates that the valid data is not available, as
> determined in step 1168 in FIG. 7-2, the socket will
> continually read if the error as determined in step 1169 in
> FIG. 7-2 as a time out operation.

Apparently, the Chu system checks for the presence or absence of data.

However, Chu fails to teach what "valid" data is, what thing "validates"

the data, or what method is used to "validate" the data. In addition, the Chu system

appears to be concerned only with file movement and not with file content.

Nothing has been found in Chu that is believed to teach or suggest "a file

transformation component configured to at least one of reformat, validate, and enrich file

content using enterprise logic," as recited in Claim 1. Accordingly, Applicants submit

that Claim 1 is not anticipated by Chu, and therefore respectfully request withdrawal of

the rejection under 35 U.S.C. § 102(b).

Another notable feature of Claim 1 is that the system includes a messaging

infrastructure component configured to facilitate workflow management of the files

through the system.

Chu apparently teaches the use of techniques for the secure delivery of

electronic documents between users over the Internet. Chu states:

> In a second aspect of the present invention, a method of
> transferring a file from a first client to a second client
> includes issuing first instructions from the first client to
> register an account with a digital asset distribution (DAD)
> server via a DAD website for transferring a file the second
> client. The first client includes a web browser for accessing
> the website. The method also includes issuing second
> instructions for uploading the file to the DAD server via the

DAD website, where upon the first client initially accessing the website, embedded client software for uploading the file is automatically downloaded to the first client. The method also includes notifying the second client that the file is available for downloading from the DAD web site, connecting the second client to the DAD server via the DAD website for downloading the file and downloading the file. The second client also includes a web browser for accessing the DAD website.

(Chu, paragraph 11.) Apparently, Chu teaches that a first client can issue instructions to a server to transfer files from the first client to a second client. Applicants understand these instructions merely to be a way of designating the recipient and the sender of the file, but does not describe the workflow (or routing) that the file will take on its way through the system.

Nothing has been found in Chu that is believed to teach or suggest, "a messaging infrastructure component configured to facilitate workflow management of said files through said system," as recited in Claim 1. Accordingly, Applicants submit that Claim 1 is not anticipated by Chu, and therefore respectfully request withdrawal of the rejection under 35 U.S.C. § 102(b).

Independent Claim 12 includes features similar to those of Claim 1 and therefore is believed to be patentable for at least the reasons discussed above. The other rejected claims in this application depend from either Claim 1 or Claim 12 and therefore are submitted to be patentable for at least the same reasons. Because each dependent claim also is deemed to define an additional aspect of the invention, individual reconsideration of the patentability of each claim on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and the allowance of the present application.

No petition to extend the time for response to the Office Action is deemed necessary for this Amendment. If, however, such a petition is required to make this Amendment timely filed, then this paper should be considered such a petition and the Commissioner is authorized to charge the requisite petition fee to Deposit Account 06-1205.

CONCLUSION

Applicants' undersigned attorney may be reached in our New York Office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,

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